

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Inquiry Regarding Carrier Current)	ET Docket No. 03-104
Systems, Including Broadband over)	
Power Line Systems)	

TO: THE COMMISSION

COMMENTS OF THE POWER LINE COMMUNICATIONS ASSOCIATION

The Power Line Communications Association (the “PLCA”), by its counsel, and pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, hereby submits comments in response to the above-referenced Notice of Inquiry (“*NOI*”).

Founded in 2001, the PLCA is a domestic trade association representing the interests of electric utilities, manufacturers, and Internet service providers interested in offering power line communications, or broadband over power lines (“BPL”). The association was formed to educate policy makers and the public about the benefits of power line communications and to advocate on behalf of the industry to improve business conditions. The PLCA’s primary membership is comprised of electric utilities that, combined, provide electric power to over ten percent of American households.¹ In addition, associate membership in the PLCA is open to other parties who have an interest in BPL, such as equipment manufacturers, software

¹ The PLCA’s electric utility members include Ameren Corporation, Dominion Resources, Inc., Southern Company, TXU Electric, Progress Energy, and PPL.

companies, and Internet service providers.² The PLCA has been, and remains, a vigorous advocate for its members before the Commission and before various state utility commissions.

In February of 2002, the PLCA first alerted the Commission to the potential of power line communications.³ In addition to noting the various benefits of power line communications to consumers and utilities, the PLCA's initial comments to the Commission also stated that although BPL could be deployed under Part 15 of the Commission's Rules, limited revisions to the existing Rules could expand flexibility in designing BPL networks, improve the quality of BPL service, and extend BPL's reach into rural areas.

No doubt exists that the BPL technology works and can provide the basis for a new, competitive broadband platform.⁴ The PLCA is pleased, therefore, that the Commission has instituted this proceeding to determine what changes or additions to its rules are appropriate to facilitate the deployment of BPL.

The questions posed by the Commission in its *NOI* regard technical issues. Accordingly, the PLCA believes that its members, many of which are actively engaged in the manufacture, development and proliferation of BPL systems and equipment, are best suited to provide the Commission with actual test information, and detailed surveys and analysis. PLCA understands that several of its members will offer comments in this proceeding. For its part, the PLCA urges the Commission to give primary consideration to actual field tests and surveys of entities offering and testing BPL services and products. The Commission must discount speculative and self-serving comments offered by parties who seek only to hinder the deployment of BPL technology.

² The PLCA's non-electric utility members include Earthlink, Main.net, Big River Telephone Company, Ambient Corporation, Plexeon Logistics, Inc., and Softential.

³ See Comments of the Power Line Communications Association, ET Docket No. 01-278 (filed Feb. 12, 2002).

⁴ See Letter from Nancy J. Victory, Asst. Sec. of Commerce to Michael Powell, Chairman FCC (Apr. 23, 2003).

The PLCA looks forward to working with its membership and the Commission to develop Rules to hasten the ubiquitous deployment of BPL. Should the Commission determine that various industry participants should be brought together to consider in depth any of the issues posed in the *NOI*, the PLCA would be pleased to participate in, and to coordinate, such efforts.

Respectfully submitted,

Alan R. Shark
President
Power Line Communications Association
200 North Glebe Road
Suite 1000
Arlington, VA 20004-2134
(202) 835-7814
www.plca.net

/s/ Raymond A. Kowalski
Richard P. Keck
Raymond A. Kowalski
Eric J. Schwalb
TROUTMAN SANDERS LLP
401 9th Street, NW
Suite 1000
Washington, DC 20004-2134
(202) 274-2950

Its Counsel

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